

1 ROGER L. GRANDGENETT II, ESQ., Bar # 6323  
2 MATTHEW T. CECIL, ESQ., Bar # 9525  
3 LITTLER MENDELSON, P.C.  
4 3960 Howard Hughes Parkway  
5 Suite 300  
6 Las Vegas, NV 89169-5937  
7 Telephone: 702.862.8800  
Fax No.: 702.862.8811  
Email: rgrandgenett@littler.com  
Email: mcecil@littler.com

6  
7 Attorneys for Defendant  
Wal-Mart Stores, Inc.

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10  
11 KEVIN ZIMMERMAN, an individual,  
12 Plaintiff,  
13 vs.  
14 WAL-MART STORES, INC.,  
15 Defendant.

Case No. 2:17-cv-00568-GMN-GWF

**[PROPOSED] STIPULATION AND  
ORDER TO EXTEND TIME FOR  
DEFENDANT TO FILE A RESPONSE TO  
THE COMPLAINT**

**[FOURTH REQUEST]**

16  
17 Plaintiff KEVIN ZIMMERMAN (hereinafter “Plaintiff”) and Defendant WAL-MART  
18 STORES, INC., (hereinafter, “Defendant”) by and through their undersigned counsel, hereby agree  
19 and stipulate to extend the time for Defendant to file a response to the Plaintiff’s Complaint from the  
20 current deadline of July 17, 2017 up to and including **August 14, 2017**.

21 The parties’ counsel met on June 9, 2017 and reached a settlement, the general terms of  
22 which have since been confirmed in an email. At this time, a response to the complaint is  
23 unnecessary because this matter will be dismissed after the settlement is executed. Accordingly, the  
24 parties request that this stipulation be granted.

25 The settlement agreement should be finalized on July 21st and will thereafter be exchanged  
26 for signature. The parties believe the settlement will be finalized in the next two weeks, but have  
27 requested this 28 day extension out of an abundance of caution to ensure sufficient time to resolve  
28 any potential wording issues with the settlement agreement.

This is the fourth request for an extension of time to respond to the Complaint. This request is made in good faith and not for the purpose of delay.

Dated: July 17, 2017

Dated: July 17, 2017

Respectfully submitted,

Respectfully submitted,

*/s/ Whitney C. Wilcher*  
WHITNEY C. WILCHER, ESQ.  
THE WILCHER FIRM

*/s/ Matthew T. Cecil*  
ROGER L. GRANDGENETT II, ESQ.  
MATTHEW T. CECIL, ESQ.  
LITTLER MENDELSON, P.C.

ORDER

## IT IS SO ORDERED

Dated: August 15, 2017.

George Foley Jr.  
UNITED STATES MAGISTRATE JUDGE

Firmwide: 148856172.1 999999.6420